

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION  
CINCINNATI, OH**

**Ohio Justice and Policy Center**  
***Plaintiff,***

**vs.**

**Annette Chambers Smith, et al.**  
***Defendants.***

)  
) Case No:  
)

) Judge:  
)

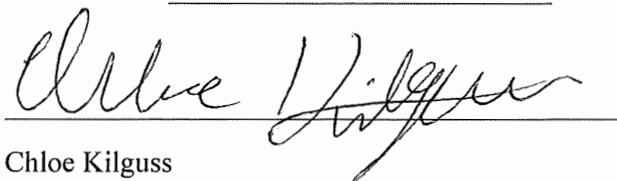
) Magistrate Judge:  
)

) **DECLARATION OF CHLOE KILGUSS**  
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I, Chloe Kilguss, pursuant to 28 U.S.C. §1746, declare under penalty of perjury as follows:

1. I have personal knowledge of the facts stated herein.
2. I am currently employed as a Legal Administrative Assistant at Plaintiff OJPC.
3. One of my job duties is to monitor voicemails received by OJPC at the number 513-421-1108.
4. On December 10, 2024, I received a voicemail from Oscar Smith at Marion Correctional Institution reading aloud from a piece of confidential legal mail OJPC had sent to a client at MCI.
5. The voicemail stated in part, "the confidential legal mail control numbers are to be used only for legal mail. This newsletter you guys sent out: 'the holiday season reminds us of the importance of hope.' Those letters could have been sent via regular mail."
6. The letter in question was a confidential communication intended for our incarcerated clients, and was duly marked as confidential legal mail and had a control number affixed to the envelope.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 3/3/2025

  
Chloe Kilguss

